

## REMARKS

### **I. General**

Claims 1-33 were pending in the present application. The current Office Action (mailed August 4, 2004) indicates that claims 32 and 33 are allowed, and further indicates that claims 21-23 and 27 would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims. The remaining claims stand rejected in the current Office Action. The outstanding issues raised in the current Office Action are:

- Claims 1-5, 8-12, 14-15, and 28-31 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,583,790 issued to Wolters (hereinafter "*Wolters*"); and
- Claims 6-7, 13, 15-20, and 24-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wolters* in view of U.S. Patent No. 6,163,319 issued to Percy et al. (hereinafter "*Percy*").

In response, Applicant respectfully traverses the outstanding claim rejections, and requests reconsideration and withdrawal thereof in light of the amendments and remarks presented herein.

### **II. Amendments**

Claims 1 and 28 are amended and new claims 34-36 are added herein. No new matter is presented by these claim amendments and newly added claims.

Claim 1 is amended to add the following language: "wherein said computing comprises computing a first dot product ( $W_{00}$ ) of a first vector ( $D_1$ ) with itself". Support for this amendment to claim 1 can be found at least on page 17 of the specification of the present application.

Independent claim 28 is amended to add the language "wherein said computing comprises computing a dot product of a first vector with itself". Support for this amendment can be found at least on page 17 of the specification of the present application.

New claim 34 depends from claim 1, new claim 35 depends from new claim 34, and new claim 36 depends from claim 28. Support for these new claims can be found at least on page 17 of the specification of the present application.

### **III. Rejections under 35 U.S.C. § 102(e) over *Wolters***

Claims 1-5, 8-12, 14-15, and 28-31 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Wolters*. Applicant respectfully traverses this rejection as provided further below.

To anticipate a claim under 35 U.S.C. § 102, a single reference must teach every element of the claim, *see* M.P.E.P. § 2131. Applicant respectfully submits that *Wolters* fails to teach each and every element of claims 1-5, 8-12, 14-15, and 28-31.

#### **A. Independent Claim 1**

Independent claim 1 is amended herein to recite:

for each of said plurality of graphics primitives, computing at least two texture coordinate gradient vectors, wherein said computing comprises computing a first dot product ( $W_{00}$ ) of a first vector ( $D_1$ ) with itself ...

*Wolters* fails to teach computing a first dot product of a first vector with itself, as discussed further with claim 14 below. Therefore, *Wolters* fails to teach at least the above limitation of independent claim 1, and thus fails to anticipate claim 1 under 35 U.S.C. § 102(e). Accordingly, withdrawal of the rejection of independent claim 1 is respectfully requested.

#### **B. Independent Claim 14**

Independent claim 14 recites, *inter alia*, “calculating a first dot product of said first vector by said first vector”. The current Office Action fails to cite any portion of *Wolters* that teaches this element. Further, Applicant fails to find any mention in *Wolters* of calculating a first dot product of said first vector by said first vector. While *Wolters* teaches at column 8, lines 57-60, “approximating a dot product of each sampled normal with an arbitrary unit vector to form a first set of coefficients”, Applicant finds no mention in *Wolters* of

calculating a dot product of a first vector with itself (e.g.,  $\text{first\_vector} \bullet \text{first\_vector}$ ). The above-mentioned dot product calculation of *Wolters* computes the dot product of two different vectors (i.e., a sampled normal with an arbitrary unit vector). Thus, *Wolters* fails to teach at least the recited first dot product of claim 14.

In view of the above, *Wolters* does not teach all elements of claim 14 and thus fails to anticipate claim 14 under 35 U.S.C. § 102(e). Accordingly, withdrawal of the rejection of independent claim 14 is respectfully requested.

### **C. Independent Claim 28**

Independent claim 28, as amended herein, recites:

for each of said plurality of graphics primitives, computing at least two texture coordinate gradient vectors, wherein said computing comprises computing a dot product of a first vector with itself ... (emphasis added)

As discussed with independent claim 14 above, *Wolters* fails to teach computing a dot product of a first vector with itself in determining the texture coordinate gradient vectors. Therefore, *Wolters* does not teach all elements of claim 28 and thus fails to anticipate claim 28 under 35 U.S.C. § 102(e). Accordingly, withdrawal of the rejection of independent claim 28 is respectfully requested.

### **D. Dependent Claims**

Claims 2-5, 8, 11-12, 15, and 29-31 are rejected as being anticipated by *Wolters*, and each of these claims depends either directly or indirectly from one of independent claims 1, 14, and 28. Thus, each of claims 2-5, 8, 11-12, 15, and 29-31 inherit all limitations of their respective independent claims. It is respectfully submitted that dependent claims 2-5, 8, 11-12, 15, and 29-31 are allowable not only because of their dependency from their respective independent claims for the reasons discussed above, but also in view of their novel claim features (which both narrow the scope of the particular claims and compel a broader interpretation of their respective independent claims).

#### **IV. Rejections Under 35 U.S.C. § 103(a)**

Claims 6, 7, 13, 15-20, and 24-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wolters* in view of *Peercy*. Applicant respectfully asserts that *Wolters* is not a valid prior art reference for use in a § 103(a) rejection. As amended by the American Inventor's Protection Act of 1999 (the Act), signed on November 29, 1999, section 103(c) now states:

(c) Subject matter developed by another person, which qualifies as prior art only under one or more of sub-sections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the invention was made, owned by the same person or subject to an obligation of assignment to the same person.

Section 4807 of the Act further provides that this new provision applies to any application filed on or after the date of enactment, November 29, 1999. The present application was filed August 3, 2001.

The Examiner will note that *Wolters* and this application are assigned to the same entity, Hewlett Packard Development Company LP. *Wolters* was filed before, but did not issue until after the current application's filing date. Therefore, the disclosure of *Wolters* is available only as 35 U.S.C. § 102(e)-type prior art. In that regard, 35 U.S.C. § 103(c) now provides that *Wolters* "shall not preclude patentability" of the claimed invention.

Accordingly, the rejection of claims 6, 7, 13, 15-20, and 24-26 should be withdrawn.

#### **V. New Claims 34-36**

New claims 34-35 are added, which each depend either directly or indirectly from claim 1 and are therefore believed to be allowable at least based on their dependency from claim 1 for the reasons stated above. Similarly, new claim 36 is added, which depends from claim 28 and is therefore believed to be allowable at least based on its dependency from claim 28 for the reasons stated above.

**VI. Conclusion**

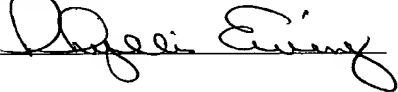
In view of the above, Applicant believes the pending application is in condition for allowance.

The required fee for this response is enclosed. If any additional fee is due, please charge Deposit Account No. 08-2025, under Order No. 10015870-1 from which the undersigned is authorized to draw.

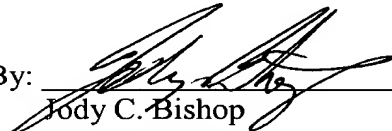
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Date of Deposit: November 4, 2004

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